

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	NO. 4:12CR270
	§	(Judge Schell)
STEPHEN SHERWIN STEPHO	§	

**MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS;

COMES NOW, Defendant STEPHEN SHERWIN STEPHO, by and through his undersigned  
attorney, and files this, his MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES,  
CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE, and would  
show this Honorable Court as follows, to-wit:

**I**

**PROCEDURAL HISTORY**

On the 13th day of December, 2012, the Defendant appeared before United States Magistrate  
Judge Don D. Bush for an Arraignment on a one-count indictment in which the Defendant is charged  
with a violation of Title 18 U.S.C. §875(d) (Interstate Communications). At that time, the Office  
of the Federal Public Defender for the Eastern District of Texas was appointed to represent the  
Defendant. The Pretrial Order relating to Pretrial Discovery and Inspection was filed and scheduled  
a Final Pretrial Conference for March 4, 2013.

**GROUND FOR MOTION**

Defense counsel is currently in the process of receiving and reviewing discovery. Because of the nature of the offense and the possible punishment, defense counsel must then carefully review the evidence with the Defendant and insure that all questions are answered. In addition, there are issues that defense counsel wishes to discuss with the government and present to the Defendant. Defendant respectfully requests additional time to discuss the case with counsel for the government and insure that all evidence is reviewed in order to make a fully informed decision. This request is made in order to insure that effective assistance of counsel is provided to the Defendant.

Due to the reason outlined above, Defendant respectfully requests an additional 30 days for the pretrial motion dates, change of plea deadline, and final pretrial conference date.

WHEREFORE PREMISES CONSIDERED, Defendant respectfully requests that the pretrial motion dates, change of plea deadline, and final pretrial conference date in this case be reset from their current setting for an additional 30 days.

Respectfully Submitted,

/s/ Robert Arrambide  
ROBERT ARRAMBIDE  
Bar No. 01356940  
Assistant Federal Public Defender  
7460 Warren Parkway, Suite 270  
Frisco, TX 75034  
469/362-8506  
469/362-6010 (FAX)

### **CERTIFICATE OF CONFERENCE**

Defense counsel contacted Assistant United States Attorney, Shamoil Shipchandler, and the Government does not oppose this motion.

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of February, 2013, a true and correct copy of the foregoing Defendant's MOTION FOR CONTINUANCE OF PRETRIAL MOTION DATES, CHANGE OF PLEA DEADLINE, AND FINAL PRETRIAL CONFERENCE DATE was sent by CM/ECF to:

Shamoil Shipchandler  
Assistant U.S. Attorney  
101 East Park Blvd.  
Suite 500  
Plano, Texas 75074

/s/ Robert Arrambide  
ROBERT ARRAMBIDE  
*Attorney for Defendant*